

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	KENTON B. LOXLEY	:	CHAPTER 13
	DEBORAH D. LOXLEY	:	
	Debtor	:	
		:	
	JACK N. ZAHAROPOULOS	:	
	STANDING CHAPTER 13 TRUSTEE	:	
	Movant	:	
		:	
	KENTON B. LOXLEY	:	CASE NO. 1-24-bk-02928
	DEBORAH D. LOXLEY	:	
	Respondent	:	

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 12th day of December 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. § 1322(a)(2) in that the Debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507.

2. Debtor(s)' Plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, the Debtor has excess non-exempt equity in the following:

a. Property held as tenants by the entireties to the extent of joint claims.

3. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:

- a. The Debtor has not provided to the Trustee copies of 2023 Federal Income Tax returns as required by § 521(e)(2)(A).
- b. Need credit report and a copy of deed for real property on Schedule A.

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WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 12th day of December 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

JOHN M HYAMS ESQUIRE
2023 N 2ND STREET, SUITE 203
HARRISBURG, PA 17102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee